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April 10, 1992

RECEIVED

APR 10 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: **Petition for Rule Making**
FM Table of Allotments
Channel 225C3 at St. Joseph, Minnesota

Dear Ms. Searcy:

On behalf of St. Joseph Broadcasters, a Minnesota Partnership, we hereby submit an original and four copies of its Petition for Rule Making concerning the allocation of FM Channel 225C3 to St. Joseph, Minnesota.

Please direct any questions or correspondence concerning this matter to our offices.

Very truly yours,

Louise Cybulski

Gregg P. Skall
Louise Cybulski
Counsel for St. Joseph Broadcasters,
a Minnesota Partnership

Enclosures

No. of Copies rec'd 0+4
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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APR 10 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 92-____
Table of Allotments,) RM No. _____
FM Broadcast Station)
(St. Joseph, Minnesota))

TO: The Commission

PETITION FOR RULE MAKING

St. Joseph Broadcasters, a Minnesota Partnership ("SJB"), by its attorneys and pursuant to Section 1.401(d) of the Commission's Rules, hereby seeks to amend the FM Table of Allotments to allocate FM Channel 225C3 to St. Joseph, Minnesota, as that city's first local aural service. In support of this proposal, the following is shown:

1. St. Joseph, Minnesota is an incorporated city with a population of 3,294, based on 1990 U.S. Census data. There is currently no local aural service licensed to St. Joseph.

2. SJB submits herewith an Engineering Statement and Exhibits setting forth the technical parameters of its proposal. Based on this information, it appears that SJB's proposal will meet the Commission's minimum distance separation requirements of Section 73.207 of the Commission's Rules, as long as the transmitter site is located approximately nine kilometers to the north of the center city coordinates of St. Joseph.

3. SJB's proposal, even in light of the minimal site restriction, meets the signal coverage requirements of Section 73.315(a). As demonstrated in Engineering Exhibit E-3, the entire community of license would be encompassed by the proposed station's 70 dBu contour. In addition, a Class C3 station at St. Joseph would provide regional service.

4. In the event Channel 225C3 is allocated to St. Joseph, SJB will promptly file an application for authority to construct and operate a new FM broadcast station at St. Joseph, Minnesota. If SJB's application for a construction permit is granted, SJB will promptly construct and operate an FM station at St. Joseph.

Respectfully submitted,

**ST. JOSEPH BROADCASTERS,
A MINNESOTA PARTNERSHIP**

By: 

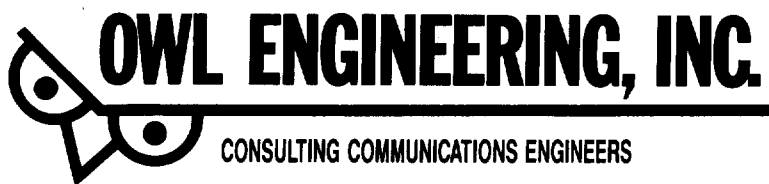
Gregg P. Skall
Louise Cybulski

Its Attorneys

Pepper & Corazzini
200 Montgomery Building
1776 K Street, NW
Washington, DC 20006

202/296-0600

April 10, 1992



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF ST. JOE BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

April 3, 1992

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IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

Owl Engineering, Inc. has been retained by ST. JOE BROADCASTERS (hereafter SJB) to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Saint Joseph, MN		225C3

The reference coordinates used for this study are:

45 38' 47" North Latitude
94 18' 10" West Longitude

SJB's proposal will provide Saint Joseph, Minnesota with first aural regional service.

The proposed site will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 4,746 square kilometers. Saint Joseph has a population of 3,294 based on 1990 U.S. Census data.

The proposal of SJB was evaluated to determine if the proposed coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1.



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THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

As can be seen from exhibit E-1, SJB's proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules with a site restriction 9 kilometers to the north. There would be approximately 39 square kilometers to select a suitable transmitter site to meet FCC spacing and city coverage requirements. The available area to locate a transmitter site is depicted in Engineering Exhibit E-2.

The proposal of SJB was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the center city coordinates of Saint Joseph is 9 kilometers at a bearing of 187.5 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 23.3 kilometers, surpassing the city by some 14 kilometers. Engineering Exhibit E-3 shows the 70 dBu signal contour plotted and demonstrates that all of Saint Joseph is encompassed by the 70 dBu contour. Engineering Exhibit E-4 shows the intervening terrain between the reference coordinates and Saint Joseph. As can be seen from this exhibit there are no major obstacles in the path to the principle city. Clearly, the proposal of SJB meets the requirements of FCC Rules section 73.315(a).

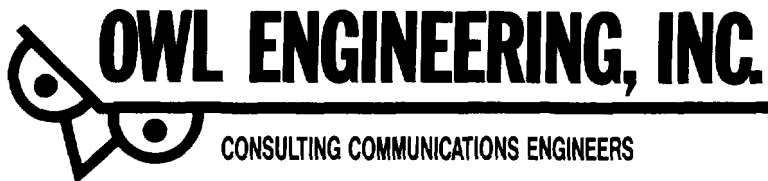


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ON BEHALF OF ST. JOE BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Saint Joseph with a full time regional broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will provide Saint Joseph with first aural service.



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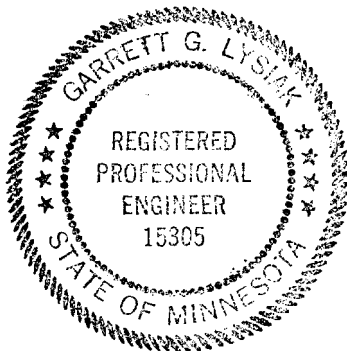
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**ENGINEERING STATEMENT
ON BEHALF OF ST. JOE BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

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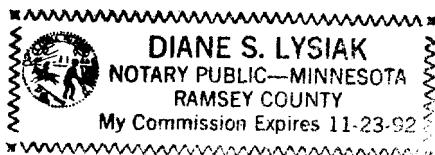
RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota; that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



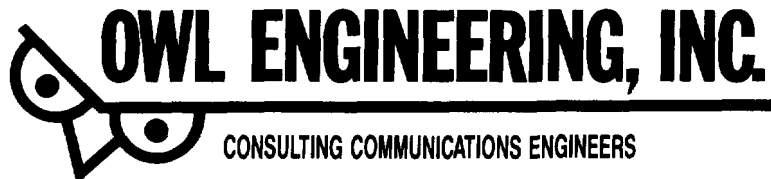
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date April 3, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1992



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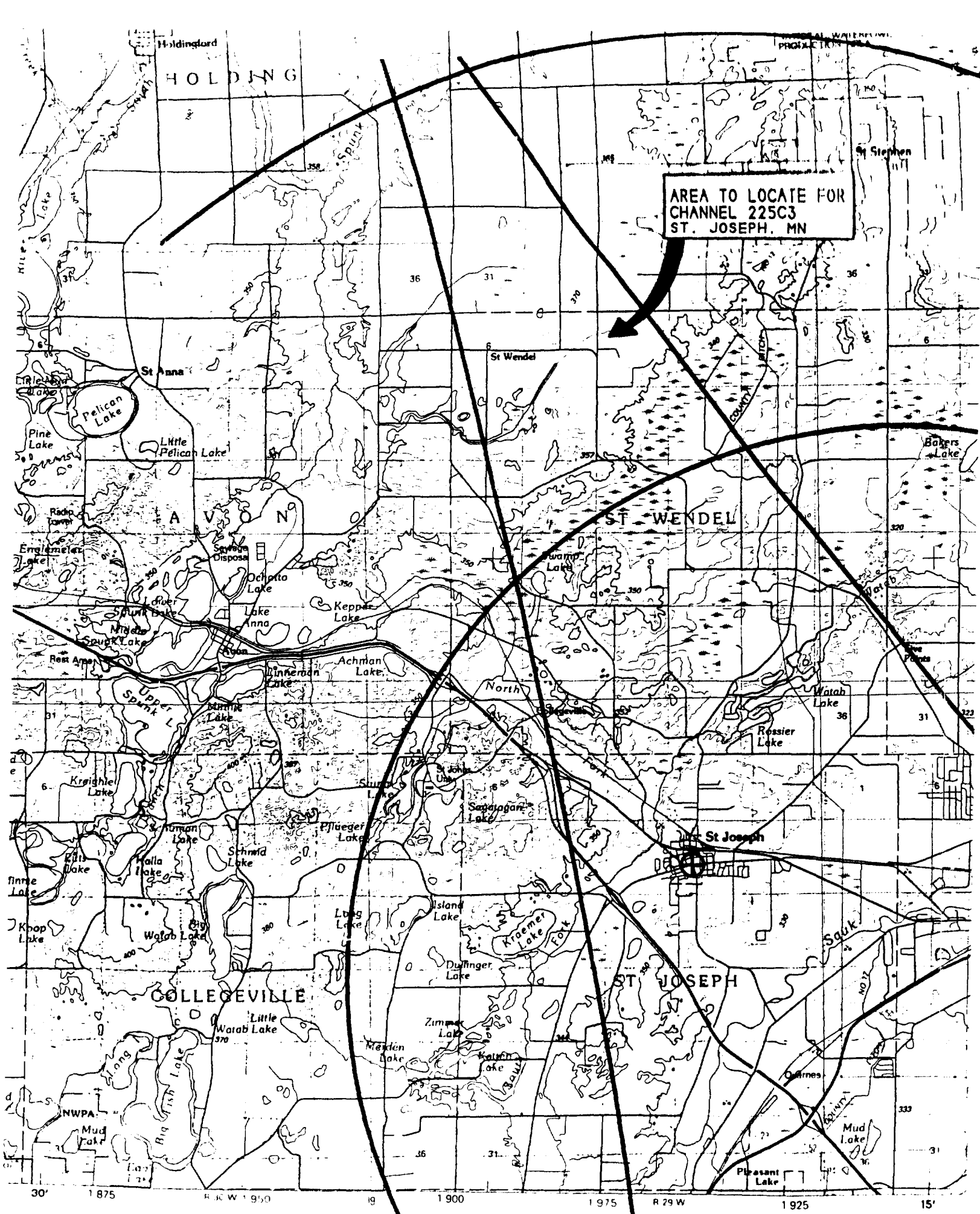
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(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING EXHIBIT E-1
ST. JOE BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 225 TO SAINT JOSEPH, MINNESOTA**

FM Channel 225-C3

LATITUDE: 45° 38' 47"
LONGITUDE: 94° 18' 10"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
279		FAMN Waite Park	C3	22.99	14	8.99	149.90
279	KXSSF	FMMN Waite Park	A	11.93	12	-0.07	164.33
279	KXSSF	FMMN Waite Park	C3	22.23	14	8.23	144.35
278		NO CONFLICT					
222		NO CONFLICT					
223		FAMN Golden Valley	C	104.41	96	8.41	134.17
223	KQRSF	FMMN Golden Valley	C	113.15	96	17.15	124.95
224		NO CONFLICT					
225	WSCDF	FMMN Duluth	C1	211.08	211	0.08	52.14
225		FASD Watertown	C1	235.57	211	24.57	250.37
225		FAMN Duluth	C1	211.08	211	0.08	52.14
225	KSDRF	FMSD Watertown	C1	216.59	211	5.59	256.92
226		FAMN New Ulm	C1	168.88	144	24.88	176.88
226	KXLP	FMMN New Ulm	C1	168.88	144	24.88	176.88
227		NO CONFLICT					
228		NO CONFLICT					



E 1:100 000

REPRESENTS 1 KILOMETER ON THE GROUND
INTERVAL 10 METERS

1000

5000

10 000

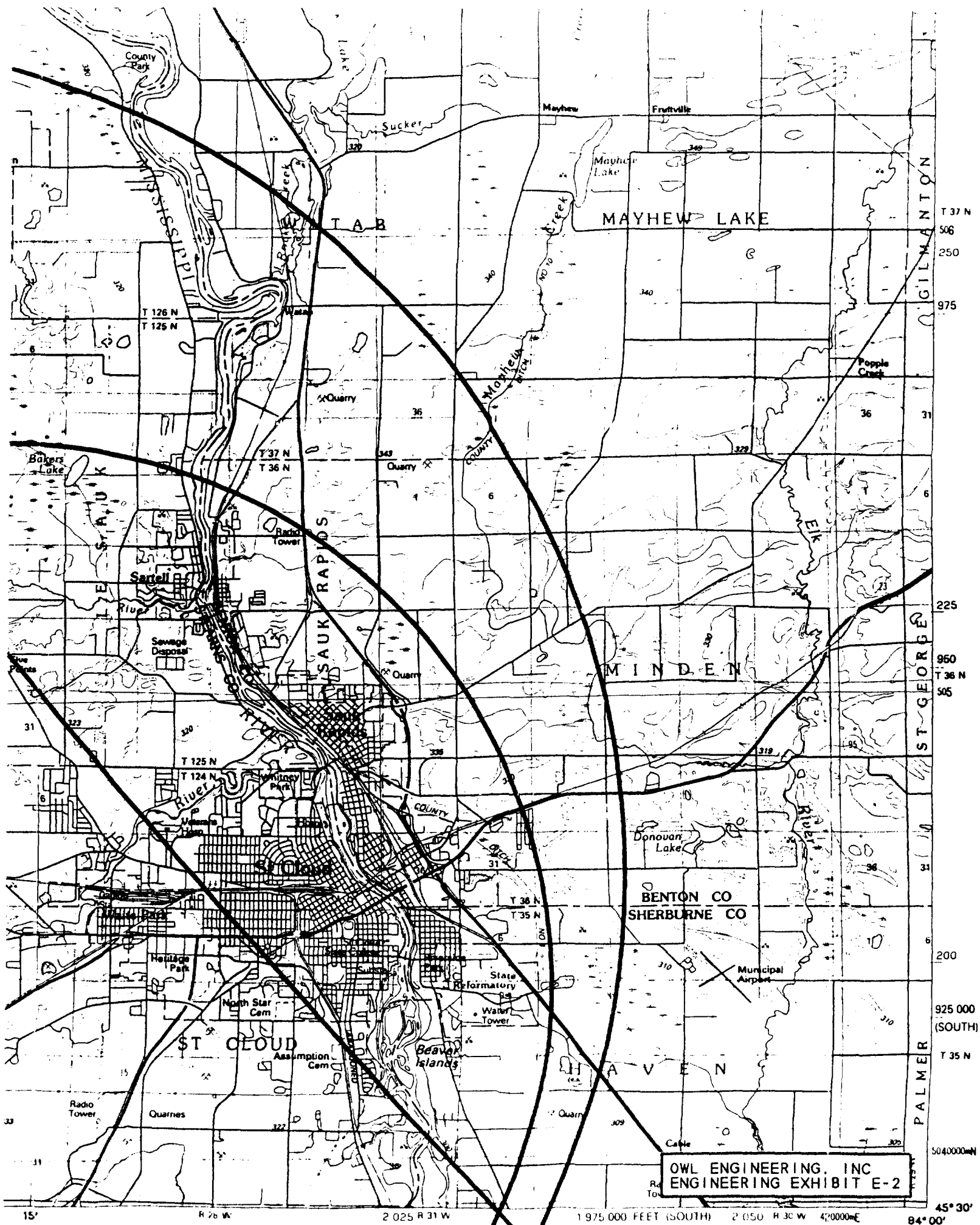
5000

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30 000

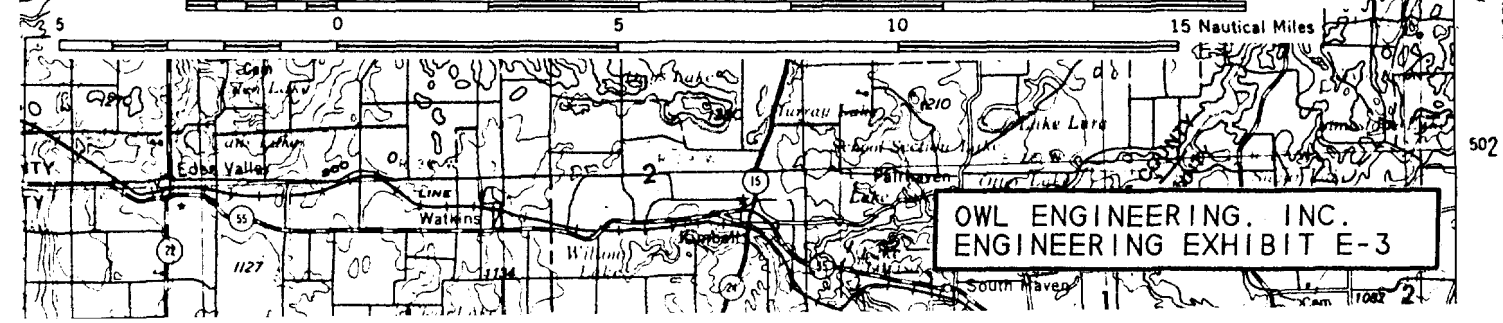
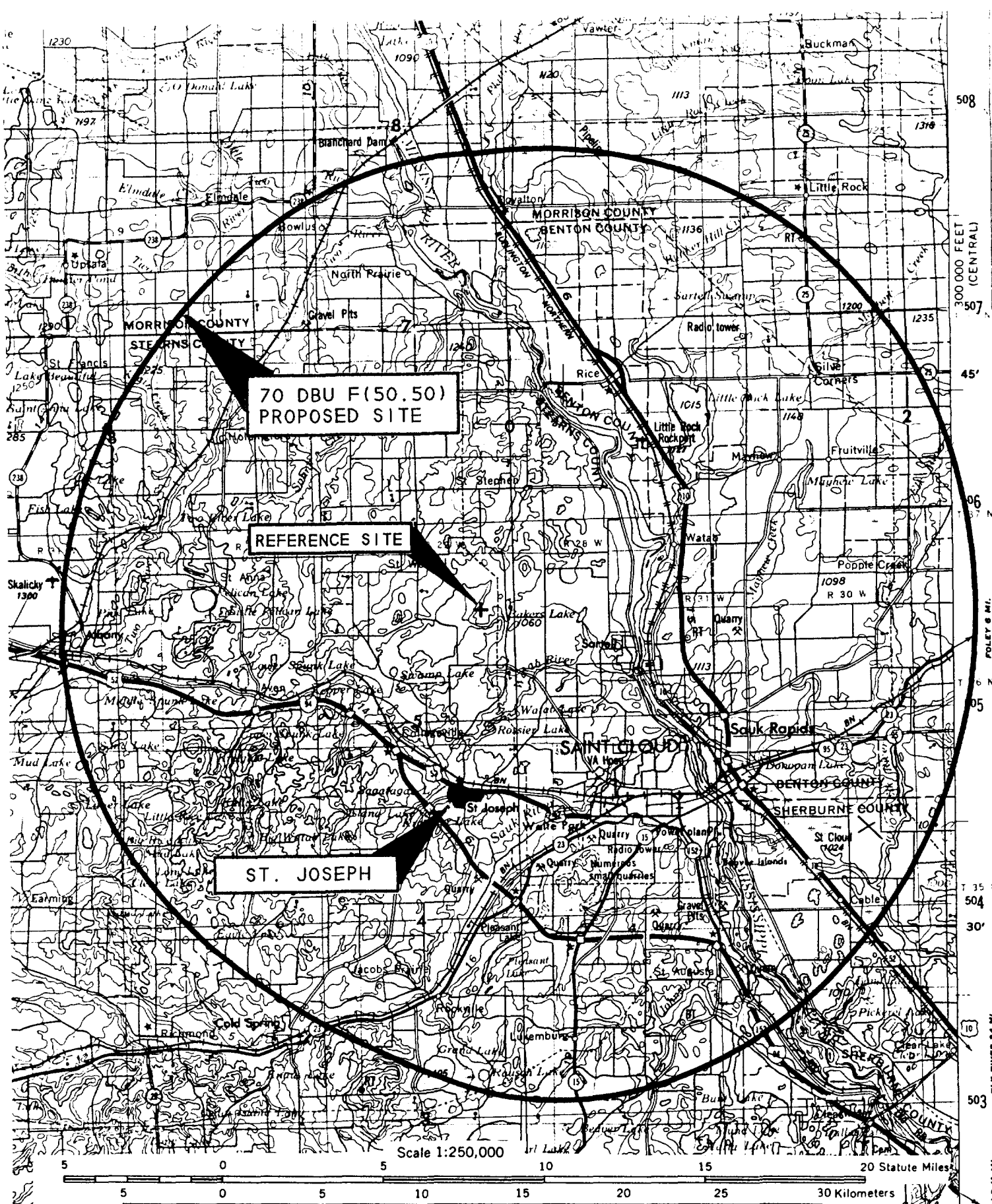
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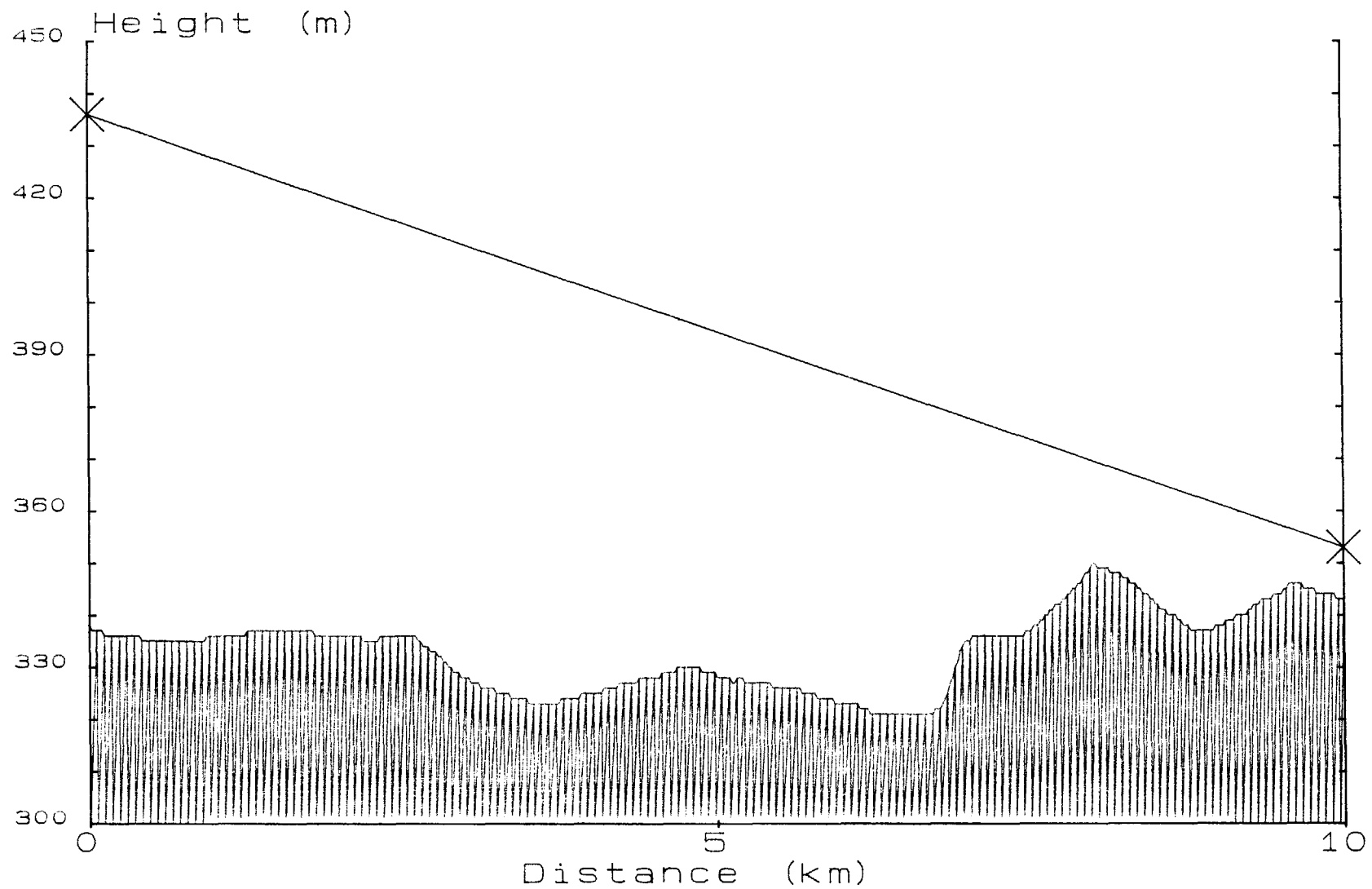


15000

20 000 METERS

ST. CLOUD, MINNESOTA
45004.E1.TM 100





Profile Study for St. Joseph, MN

Owl Engineering, Inc. Saint Paul, Minnesota
1306 W. County Rd. F (612) 631-1338

Engineering Exhibit E-4